

PART 70/ENHANCED NSR/FESOP PERMIT APPLICATION INSTRUCTIONS

**ATTACHMENT 5**

**COMPLIANCE PLAN GUIDELINES**

**January 1995**

This attachment will provide some guidelines for generally accepted compliance methods that may be included in the preparation of a compliance plan for Part 70 sources required to complete FORMS CD-02 and CD-03. This information may also be useful for sources applying for FESOP permits in understanding what may be required to determine compliance.

**A. RECORD KEEPING AND MONITORING GUIDELINES**

The following table shows generally acceptable record keeping and monitoring practices for certain types of air pollution control equipment. These guidelines represent a minimum standard.

Pollution Control Equipment Type	Monitoring	Record keeping
Baghouse (Fabric Filter)	Pressure Drop	-Record pressure drop at least once every calendar day when in operation. -Record corrective action taken when pressure drop or opacity readings indicate there is a problem. This includes recording when each bag is replaced.
Cyclone/ Rotoclone	-Pressure Drop; and -Level indicator readings (if applicable) -Water pressure for rotoclones only	-Record pressure drop, level indicator reading, and water pressure at least once every calendar day when in operation. -Record corrective action taken when pressure drop, level indicator readings or opacity readings indicate there is a problem.
ESP (Electrostatic Precipitator)	-Primary and secondary voltage -Primary and secondary current -Sparking rate -Number of fields on line	-Record each parameter at least once every calendar day when in operation. -Record corrective action taken when monitored parameters indicate that there is a problem.
Wet Scrubber	-Pressure drop across the absorber and demister in inches of water -Additive concentration, if applicable -pH of liquid, if applicable -liquid flow rate in gpm	-Record each parameter at least once every calendar day when in operation. -Record corrective action taken when monitored parameters indicate that there is a problem.
Thermal Oxidizer	-Combustion temp.; or -Inlet temperature and outlet temperature	-Continuous hard copy readout; or -Manual readings every 15 minutes when in operation. -Record corrective action taken when combustion temperature/inlet and outlet temperature indicate(s) that there is a problem.

Pollution Control Equipment Type	Monitoring	Record keeping
Catalytic Oxidizer	-Inlet temperature and Outlet temperature across the bed	-Continuous hard copy readout of temperatures; or -Manual readings every 15 minutes when in operation. -Record the quarterly results of the catalyst reactivity testing and any corrective action taken as a result of the testing. -Record corrective action taken when temperatures indicate that there is a problem.
Adsorber	-Operational temperature, where appropriate -Amount of solvent adsorbed; or -VOC breakthrough monitor	-Record temperature once at least once every calendar day when in operation. -Record each time the adsorber is cleaned or replaced. -Record the results for the adsorbability and retentivity tests every quarter. -Measure and record solvent adsorbed monthly. If the adsorber fills up or is used up more frequently than once a month, you must propose a more frequent, more appropriate schedule in your permit application. -Record all alarms from the VOC breakthrough monitor and the resulting corrective action.
Wall Filter	-Condition of the filters (alignment, saturation, tears, holes, etc.)	-Inspect the filters at least once every calendar day when in operation. Record the condition of the filters and the corrective action taken.
No Control Equipment	-There are no specific guidelines for parameters to monitor if you will use a process change* to control emissions or if you do not have any control equipment, because these situations exist for such a variety of pollutants and process types. You must propose in your permit application what these parameters will be.	-In most cases, daily record keeping (for each day of operation) is sufficient. You must propose in your permit application what the record keeping frequency will be for each parameter you propose to monitor. -In all cases you must record corrective action taken when monitored parameters indicate that there is a problem.

\*Note: If you intend on using a process change to control emissions, the change may be classified as an alternative operating scenario.

## **B. Performance Testing Guidelines**

Performance tests includes Continuous Emission Monitoring Relative Accuracy tests as well as traditional "stack" tests. Any information used in the permit application derived from a performance test may only be used if all requirements of the performance test rule are complied with. Performance tests conducted solely as engineering tests may not be used for other purposes. All performance testing must be conducted in accordance with applicable air quality requirements. Any performance testing that is done also must adhere to 326 IAC 3-2.1, including the following specific requirements:

1. A 35 day written notification, which includes a complete test plan and the proposed test date, is required by rule and must be submitted to the Supervisor, Compliance Data Section.
2. If a 35 day notification is not given and no written authorization for a shorter notification period exists from the appropriate staff, test results will be rejected.
3. Test plans must contain all information required by 326 IAC 3-2.1. Test plan formats are available from the IDEM, Office of Air Management for the traditional performance "stack" tests as well as the CEM Relative Accuracy performance tests.
4. Incomplete test plan submittals are not acceptable. The rejection, or modification required of a test plan will be made in writing or by telephone to the permittee.
5. One hard copy of the performance test report must be submitted to the Supervisor, Compliance Data Section within 45 days of the test date.
6. Certifications by testing company staff as well as the permittee are required for all performance tests.
7. A two (2) week notification confirming the actual test date.
8. Tests shall be conducted while the facility or related facilities are operating at 95%-100% of permitted operating capacity.

## C. Reporting Guidelines

### Quarterly Reporting Requirements:

- ! Coal Sampling & Analysis
- ! For continuous emission monitors: excess emission and downtime reporting in accordance with 326 IAC 3-1.1-1.
- ! Reporting all deviations from any permit condition that occurred while you operated.

### Semi-Annual Reporting Requirements:

- ! Summary of monitoring activities
- ! Reports required by permit, including identification of deviations from any permit condition
- ! Compliance schedule progress reports

### Annual Reporting Requirements:

- ! Compliance certification
- ! Annual emission statement